



**TURTURRO** LAW, P.C.

**Main Brooklyn Office**

1602 McDonald Avenue, Brooklyn, NY 11230

**Phone:** (718) 384-2323 • **Fax:** (718) 384-2555 • **E-Mail:** natraj@turturrolawpc.com • www.turturrolawpc.com

Matthew J. Turturro, Esq. (Managing Partner)

\*Natraj S. Bhushan, Esq. (Partner)

Paulina Bellantonio, Esq. (Associate)

Anthony A. Nozzolillo, Esq. (Of Counsel)

*\*Admitted in NY and NJ*

**June 29, 2021**

***Via ECF***

Hon. John P. Cronan, USDJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:** Roc-A-Fella Records, Inc. v. Damon Dash  
**Docket No.:** 21-CV-5411  
**Subject:** OBJECTION/RESPONSE TO PLAINTIFF'S REQUEST TO  
ADJOURN THE SHOW CAUSE HEARING

Dear Judge Cronan,

The undersigned is counsel for defendant Damon Dash in this matter. The letter is submitted in response to the Court's Order dated June 29, 2021 (ECF Doc. No. 22) and the Plaintiff's letter motions to adjourn the show cause hearing scheduled for July 1, 2021. For the two reasons set forth below, the Court should deny both requests.

*First*, Defendant objects to the Plaintiff's requests to further adjourn any show cause hearing based on the prejudice he would suffer. In particular as set forth in Mr. Dash's opposition papers, given the broad language in the Court's temporary restraining order ("TRO" - ECF Doc. No. 14), which, in turn, was predicated on the misrepresentations Plaintiff made to this Court (i.e., that an NFT of the Reasonable Doubt copyright was minted and was being auctioned

off), Mr. Dash would be prejudiced insofar as the TRO currently precludes him from performing lawful conduct (i.e., disposing of his 1/3 interest in Roc-A-Fella Records, Inc.). As an adjournment of the hearing would likely result in an extension of this TRO, it is imperative that the Court hear argument on the preliminary injunction motion as soon as possible.

*Second*, Mr. Dash objects to the Plaintiff's request to cancel the show cause hearing and summarily grant it an injunction contention on consent. Simply put, the Dash Declaration makes clear that, *inter alia*, he never minted an NFT or tried to sell what was not his, and for those reasons, there is zero likelihood of success on any of Plaintiff's claims. Accordingly, the hearing should not be further delayed as neither an extension of the TRO or preliminary injunction is warranted in this matter.

For the foregoing reasons, it is respectfully requested that Plaintiff's letter motions should be denied.

Respectfully submitted,  
**TURTURRO LAW, P.C.**  
By: /s/ Natraj S. Bhushan

To (via ECF): Alex Spiro, Esq. (and all counsel of record)